

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**FIR TREE CAPITAL MANAGEMENT, LP MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL OF RECORD AND FOR EXTENSION OF
TIME**

COMES NOW, Fir Tree Capital Management, LP ("Fir Tree") and respectfully state and requests as follows:

1. Fir Tree has appeared in the captioned proceedings through attorney Javier Vilariño, Esq and the firm Vilariño & Associates, LLC. [Dkt. 16330]
2. Pursuant to Local Bankruptcy Rule 9010-1(d)(3)(C), Attorney Vilariño respectfully requests that the Court grants him leave to withdraw as counsel of record for Fir Tree in this and

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("**COFINA**") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("**HTA**") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("**ERS**") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("**PREPA**") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("**PBA**") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations). The Oversight Board submits this Disclosure Statement in Cases No. 17 BK-1283-LTS (Commonwealth), 17 BK-3566-LTS (ERS), and 17 BK-5523-LTS (PBA).

any related PROMESA proceedings, due to irreconcilable differences between the undersigned and Fir Tree representatives.

3. Fir Tree's contact information is:

Andrew Behlmann
Lowenstein Sandler LLP
One Lowenstein Drive
Roseland, New Jersey 07068.
Email: abehlmann@lowenstein.com
Tel. (973)597-2332

4. The undersigned requests that the Court takes notice of the aforementioned and grant Fir Tree fourteen (14) days to retain a new local counsel.

WHEREFORE, it is respectfully requested from this Honorable Court to note and grant this withdrawal of counsel for Fir Tree, that any and all notifications in the captioned case be addressed directly to Fir Tree and that an extension of time of fourteen (14) days be granted to Fir Tree to appear through their new counsel.

CERTIFICATE OF SERVICE

I hereby certify that on this date I electronically filed the foregoing motion, using the CM/ECF System, which will send notification of such filing to all appearing parties and counsels using the Court's electronic system. Additionally, a copy was sent to Fir Tree via email at abehlmann@lowenstein.com.

Dated: December 6, 2021

/s/ Javier Vilariño
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